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June 18, 2012

VIA ECF

The Honorable Joan M. Azrack
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East,
Brooklyn, NY 11201

Re: Jonathan Corbett v. City of New York, et al., 11-CV-3549 (CBA)(ALC)

Your Honor:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, representing defendant City of New York in the above-referenced matter. I am respectfully writing to Your Honor to provide the Court with an update regarding defendant City's May 18th letter to the Court and the progress of our investigation into identifying officers allegedly involved in the underlying incident that gives rise to this lawsuit.

In the City's May 18th letter, I informed Your Honor that the parties agreed that defendant City would endeavor to ascertain the identities of any plainclothes officers who may have been working in groups of four in unmarked vehicles on the date of the alleged incident and who were assigned to Brooklyn North Narcotics or Anticrime units within the confines of the 77th Precinct. I have investigated both the Brooklyn North Narcotics and the Anticrime Units as well as the Brooklyn Gang Squad Detective Bureau and have determined that there were no officers traveling in groups of four in an unmarked vehicle in the confines of the 77th precinct. In fact, based upon my investigation, upon information and belief, there was not even a group of four officers assigned to any vehicle, whether marked or unmarked, on the date and time of the incident. Therefore, the City submits that we have completed our investigation of this matter.

Thus, now that the investigation is complete, the parties will agree on a briefing schedule to submit to the Honorable Carol B. Amon for plaintiff's motion to amend his pleadings and the City's summary judgment motion.

Thank you for your consideration in this regard.

Respectfully submitted,

/s/

Vicki B. Zgodny
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Jonathan Corbett (Via email)

Pro Se Plaintiff